



U.S. Department of Justice

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December 6, 2021

Honorable George C. Hanks, Jr.
United States District Court
Southern District of Texas

Re: Status of cause no. 4:19-CR-832; United States v. Gerald M. Goines, et. al.

Judge Hanks:

The United States and Gerald Goines jointly propose the Court set a status hearing date for Monday, February 14, 2022.

When the parties last appeared before the Court on March 3, 2020, it was prior to the institution of COVID-19 related stay-at-home orders in Texas. Since then, the COVID-19 pandemic has placed restrictions on all the parties and has affected the ability of each party to review discovery. Further, the United States is still in the process of meeting its ongoing discovery obligations, and in the coming weeks anticipates receiving and producing another set of discovery. Once that discovery is reviewed, the parties should be in a better position to articulate an appropriate schedule for motions deadlines, pretrial conference and trial, if one is needed.

Finally, because of the case's complexities, the parties respectfully request the Court set a status conference under 18 U.S.C. § 3161(h)(7)(B)(i) & (ii) for Monday, February 14, 2022.

Respectfully submitted,

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